Employment Development Department
State of California

DRAFT DIRECTIVE TRANSMITTAL

WORKFORCE SERVICES

Number: LLDD-10

Date: June 5, 2008

TO: WORKFORCE DEVELOPMENT COMMUNITY

SUBJECT: INTEGRATED REPORTING AND PROGRAM ACCOUNTABILITY

[X] IMMEDIATE ACTION
Bring this draft to the attention of the appropriate staff.

[X] E-MAIL COPY TRANSMITTED
Number of pages (including coversheet): 9
If there are any problems with this transmittal, please call the Pagemaster at 916/654-8008.

SUBJECT MATTER HIGHLIGHTS:

This directive addresses reporting and performance accountability policy and procedure for the 12 Local Learning Labs (LLL) that have agreed to work in concert with the State in defining and evaluating options for integrated service delivery across the Department of Labor's three major workforce programs: WPA, including Veterans' programs, WIA, and TAA The option to implement some of these changes throughout the Workforce Community will be addressed in a subsequent Workforce Services Directive.

COMMENTS ARE DUE BY: 6/26/08

Comments can be submitted through one of the following ways:

1) **E-Mail** — MngePerf@edd.ca.gov(Include "draft comments" in the subject line)
2) **Mail** — WSD / P.O. Box 826880 / MIC 69 / Sacramento, CA 94280-0001

All comments received by the end of the comment period will be considered before the final directive is issued. The Workforce Services Branch does not respond individually to each comment received. However, a summary of comments will be released with the final directive. **Comments received after the specified due date will not be considered.**

If you have any questions, contact the Workforce Services Division at (916) 654-8008.

TO: WORKFORCE DEVELOPMENT COMMUNITY

SUBJECT: INTEGRATED REPORTING AND PROGRAM ACCOUNTABILITY

EXECUTIVE SUMMARY:

Purpose:

The purpose of this directive is to provide the guidelines for job seeker data reporting and program accountability for the 12 Local Learning Labs (LLL) scheduled to begin operations July 1, 2008. Specifically, this directive addresses:

- Data element reporting across the three integrated programs: Wagner-Peyser (WPA), including the Veterans' programs, the Workforce Investment (WIA), and Trade Adjustment Assistance (TAA)
- The paperwork retention requirements for the purpose of data element validation
- The definition of program accountability with an integrated customer pool across the specified programs
- The automated system options available to the LLLs for data collection and, the requirements, if any, associated with each option

Scope:

This directive applies to the 12 Local Workforce Investment Areas that have agreed to work in concert with the State in defining and evaluating options for integrated service delivery across the Department of Labor's three major workforce programs: WPA, including Veterans' programs, WIA, and TAA. The option to implement some of these changes throughout the Workforce Community will be addressed in a subsequent Workforce Services Directive.

Effective Date:

This directive is effective July 1, 2008

REFERENCES

- Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) 17-05, Common Measures Policy for the Employment and Training Administration (ETA) Performance Accountability System and Related Performance Issues, February 17, 2006
- Training and Employment Notice 19-07, Program Year 2006/Fiscal Year 2007 Performance Reporting and Data Validation, December 11, 2007
- WIA Management Information and Reporting System, Office of Management and Budget 1205-0420, Expiration Date February 28, 2009
- Labor Exchange Reporting System, Office of Management and Budget 1205-0240, Expiration Date February 28, 2009
- Trade Act Participant Report (TAPR), Office of Management and Budget 1205-0392, Expiration Date January 31, 2009

STATE-IMPOSED REQUIREMENTS:

This directive contains some State imposed requirements. These requirements are in bold-italic type.

FILING INSTRUCTIONS:

This directive should be maintained by the affected local areas until it is superseded.

BACKGROUND:

In early 2007, leadership from the Employment Development Department (EDD), the California Workforce Investment Board, and the Labor and Workforce Agency came together for the purpose of considering the development of an integrated service delivery model for California's Workforce System and its One-Stop Career Centers. This group agreed that continued economic and fiscal pressures, coupled with higher demands for service and program accountability required a fundamental change in the California workforce services delivery system. With this objective in mind, an ambitious planning effort was launched which included representatives from 12 Local Workforce Investment Areas, the California Workforce Association, and various stakeholder groups.

The guidelines in this directive are intended to support the general program framework agreed to by the State-local partnership for integrated service delivery and to provide maximum flexibility while still supporting compliance with DOL data collection and reporting requirements.

POLICY AND PROCEDURE:

The LLLs will report a single customer record for all customers receiving one or more services funded by the following programs:

WAGNER-PEYSER ACT & ASSOCIATED PROGRAMS	WORKFORCE INVESTMENT ACT	TRADE ADJUSTMENT ASSISTANCE
Labor Exchange	Adult	Trade Adjustment Assistance
Veterans	Dislocated Worker	Alternate Trade Adjustment Assistance
Migrant Seasonal Farm Workers	National Emergency Grants	

<u>Data Element Reporting and Documentation Requirements</u>

Attachment 1 lists the data elements that must be collected on all customers entering a One-Stop Career Center or affiliated site for career development or job placement assistance. Attachment 2 details the additional data collection, reporting requirements, and supporting documentation for a Career Center customer who receives staff assisted core, intensive or training services, including training funded by the TAA program. Attachment 3 diagrams the general customer flow and the associated data collection requirements.

Core services that entail significant staff assistance require enrollment of the customer and the additional applicable data collection detailed in Attachment 2. Significant staff assistance is defined based on the nature of the service not the amount of time involved. Services that assist the customer in deciding on appropriate next steps in the search for employment or related services, including assessment of an individual's immediate employability and barriers to employment, are significant staff assisted services. Initial assessment or job placement assistance is a significant staff-assisted service and requires program enrollment and the collection of the applicable data detailed in Attachment 2. Since it is expected that all learning lab customers will receive an initial assessment, the data in Attachment 2 required for the Adult Customer Group should be collected on all customers.

The data elements detailed in Attachment 2 are typically collected through an Application Form. It has been standard business practice to require the customer to sign the Application Form attesting to the accuracy of the data on the Form. <u>Because, as reflected in the requirements specified in Attachment 2 we are establishing a "paperless" customer flow, LLLs are not required to retain a signed hard copy of the customer's Application.</u>

Veterans Services

It is expected that veterans will be subject to the same customer flow as all customers entering the One-Stop or an affiliated site for skill development and job placement services. Veterans should receive priority of service and it is expected that, when appropriate, the learning lab customer flow will provide for the referral of a veteran to a Veterans Workforce Specialist (VWS) or a Veterans Employment Services Specialist (VESS) for staff-assisted intensive or training services. The data reporting requirements for Veterans served by a VESS and VWS are the same as those for all adult customers and should be done through the agreed upon Management Information System (MIS) option for the local learning lab. The VESS and VWS staff will receive a special JTA Grant Code to facilitate the reporting of customers served by a VESS or VWS.

Veterans being served by a VESS or VWS under the Services to Veterans - Vocational Rehabilitation and Employment (VR&E) Program (Title 38 Code of Federal Regulations Chapter 31) outside the One-Stop Career Center system are beyond the scope of this directive. These customers, their services, and related case notes should continue to be reported in the Program Activity Support System (PASS). If the VR&E customer receives services directly through the One-Stop Career Center system, the customer should be enrolled for services in accordance with the full requirements of this Directive.

Unemployment Insurance (UI) Claimants with an Instruction to Report to a local One-Stop Career Center

Staff in the Local Learning Labs must identify those clients who have entered the One-Stop Career Center with a notice to report to the Center in order to retain their UI benefits. These customers should be subject to the same customer flow and data reporting requirements as any other customer with one exception. Staff must enter the Activity Calendaring and Event System (ACES) and, using the customer's social security number and name, record that the individual is receiving assistance from the One-Stop Center as required. Failure to do this reporting will jeopardize the individual's UI benefits.

Program Accountability

The LLLs will be subject to the Adult Common Measures, including Entered Employment, Employment Retention, and Average Earnings. Attachment 4 provides a summary of the Common Measures definitions. The Common Measures are defined by the Department of Labor (DOL) in Training and Employment Guidance Letter (TEGL) 17-05 (February 10, 2006). All staff should review this TEGL in detail to understand the specifics of the Common Measures.

For Program Year 2008-09, for the purpose of official program accountability, the State will negotiate separate performance goals for each program with the Department of Labor and with each Local Learning Lab. Also, for the purpose of evaluation, integrated program goals will be defined and monitored. The following guidelines will govern outcome measurement in the learning labs:

- Inclusion of All Customers in the Common Measures Calculations

  A job seeker is included in the accountability measures at the point the job seeker has been determined eligible and receives a service funded by a participating program within a One-Stop Career Center, affiliated site, or remotely through electronic technologies. All adult customers are eligible for the WPA program thus all individuals that receive the benefit of WPA services are subject to WPA accountability. All customers 18 years of age and older who receive an initial assessment will also be reported under the WIA Adult program. The only exception, a customer determined to be a dislocated worker and whose direct services are all reported under the Dislocated Worker Program will be reported as a WPA customer and under the Dislocated Worker Program. If a customer receives services reported under both the Adult and Dislocated Worker programs, the customer will be attributed to both programs. Adults or Dislocated Workers that receive training funded by TAA will be reported as both Adults or Dislocated Workers and recipients of TAA services.

- Point of Exit

  The customer is exited from all enrolled programs when 90 days has elapsed since the last enrolled service estimated completion date. All services must be reported through the MIS designated as the official system for the local partnership and reported to the State in accordance with Job Training Automation (JTA) system reporting requirements. Please refer to the section titled MIS Requirements below.

  If a customer does not receive a service for 90-days and a documented gap in service has not been recorded through the MIS, the customer is automatically exited from the program on the 91st day. The 91st day is calculated based on the JTA Enrollment Form Est/End Date for the last reported service. The exit date for the customer is the last date of service. The exit quarter is the calendar quarter containing the last date of service. The table below provides two examples.

CUSTOMER	SERVICE BEGIN DATE	EST/END DATE	91st DAY	EXIT/EXIT QUARTER
A	June 1, 2008	June 30, 2008	September 29, 2008	June 30, 2008/April – June 2008
B	February 12, 2008	February 15, 2008	May 9, 2008	February 15, 2008/January – March, 2008

When an exit date is generated based on the data on the JTA Enrollment Form(s), the client is exited from all programs for which he/she is enrolled. The exit date is the same for all programs regardless of which program provided the last service.

Exit Forms

Exit forms are not required and should not be filed in the JTA system. If an Exit Form is filed, the data included on the form, applicable to a performance outcome, will be considered in the performance calculations but the exit date is solely based on the last actual or estimated service completion date reported on a JTA Enrollment Form.

Follow-up and Performance Accountability Exclusions

Post-Program Follow-up is not required for Adults and Dislocated Workers. A Follow-up Form may be filed to notify the Workforce Services Division that a customer should be excluded from performance for one of the allowable reasons listed below. However, Follow-up Forms are not expected to be filed because the magnitude of customers served will not allow for this level of customer management. This will be taken into account in performance negotiations with the Department of Labor and the Local Learning Labs.

Customers may be excluded from the performance calculations for the following reasons:

- Institutionalization
- Death
- Health/Medical or Family Care – this does not include temporary situations expected to last less than 90 days
- Reservist called to Active Duty

Supplemental Employment Data

Common Measures performance outcomes are primarily confirmed through wage records, both California wage records and records obtained from other states through the national Wage Record Interchange System (WRIS). If a customer is known to be employed or retained in a job not reported through the states' wage records, the employment status may be verified through other records and reported to the State through the Follow-up Form. Examples of such employment include self-employment, and federal employment, including military service. If the employment status for the customer is confirmed through supplemental information, Follow-up Forms reporting this information must be filed for the specific quarters applicable to the measure (please see Attachment 4). A case note must be recorded documenting the source for the employment verification and the date of that verification.

Workforce Services is not requiring or encouraging the reporting of supplemental data across the local learning labs. The number of customers served will prohibit the accurate reporting of this information.

MIS Requirements

Each local area must agree to a single MIS option to be used by the partnership. This eliminates duplicate data entry and allows the partnership to share data across programs. The local partnership must notify the Workforce Services Division of the selected MIS option no later than June 20, 2008. This notification may be provided through the Local Area's Regional Advisor. The partnership may select one of the following options:

1. *CalJOBS^{SM}-JTA*: under this option initial registration and the collection of the data required in Attachment 1 will be completed in CalJOBS^{SM} either directly by the client or with staff-assistance. The recording of the initial assessment score will be done by the staff within the Update Job Seeker Screen. Collection of the data detailed in Attachment 2 will occur within the JTA system environment. At initial entry of a Social Security Number into the JTA Application screen the JTA will auto-populate with the data previously collected through CalJOBS^{SM}. ***The PASS system will not be used in this option. All customer services will be recorded on the Enrollment Form in the JTA system.***

2. *Local MIS*: If the Local Workforce Investment Area has a MIS that meets all federal and State data collection and reporting requirements the partnership may chose to use that MIS. Under this option, the partnership must provide a labor exchange tool to all customers including a resume tool. For UI customers, staff must certify through the Eligibility Data Load that job search assistance has been provided and an automated resume has been completed. Local Areas using this option will be required to transfer data weekly to the JTA system. This reporting frequency is necessary to comply with UI "work test" requirements.

   The local MIS must have the capacity to load the data required under Attachments 1 and 2 in accordance with the file layout specifications issued by the Workforce Services Division. For detailed information about these specifications, please contact the JTA Customer Help Desk.

3. *CalJOBS^{SM}-Local MIS*: under this option initial registration and recording of the initial assessment result will occur in CalJOBS^{SM} as outlined in option 1 above. With the completion of the Initial Assessment the additional data required in Attachment 2 must be collected and all services should be recorded in the Local MIS. **PASS may not be used for the recording of services.**

   The local MIS must have the capacity to load the data required under Attachments 2 in accordance with the file layout specifications issued by the Workforce Services Division. For detailed information about these specifications, please contact the JTA Customer Help Desk.

ACTION:

The Local Learning Lab must notify their Regional Advisor of the Local Area's selected MIS option no later than June 20, 2008.

Please bring this directive to the attention of all Learning Lab staff.

INQUIRIES:

If you have questions, please contact your Regional Advisor at (916) 654-7799. Management Information System (MIS) questions may be directed to the JTA Customer Help Desk.

BILL BURKE
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Workforce Services Branch

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Chief
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Attachments are available on the Internet:

1. Initial Data Collection Requirements—All Customers (PDF)
2. Data Collection Requirements for Clients Receiving Staff Assisted Services (PDF)
3. Customer Data Flow (DOC)
4. Common Measures (PDF)